

Affirmatively Furthering Fair Housing: A Guide to NYC's Submission and Potential Issues

Strategic Planning

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Presentation overview

Introduction

1. What are the CLARIFIED AFFH requirements?
2. Overview of RECENT STRATEGY, RESEARCH, AND COMMUNICATIONS' fair housing WORK

Assessment of Fair Housing – Broad Topics

1. AFH submission requirements
2. Issues with HUD's metrics
3. The “balanced approach” to fair housing
4. Supply strategies in low-income neighborhoods (“place-based” strategies)
5. Defining comprehensive community revitalization
6. HPD's role in comprehensive community revitalization

Assessment of Fair Housing – Preliminary ANALYSIS

1. Segregation / Integration trends
2. Contributing factors of segregation, RECAPs, and patterns of publicly supported housing location and occupancy
3. Disparities in access to opportunities
4. Publicly supported housing analysis
5. Access to opportunity for people with disabilities
6. Next steps

Appendix: Analysis of high priority contributing factors

What is Affirmatively Furthering Fair Housing (AFFH)?

HUD funding recipients have an obligation to reduce barriers to fair housing, as established by the Fair Housing Act of 1968.

HUD's **Final Rule on Affirmatively Furthering Fair Housing**, released July 16, 2015:

- Seeks to enhance the capacity of HUD grantees to incorporate fair housing objectives into their work
- Outlines a “balanced approach” that allows for both mobility and place-based strategies
- Requires grantees to create an Assessment of Fair Housing (AFH) report designed to diagnose fair housing issues and guide investment decisions

What does NYC have to do and when?

Assessment of Fair Housing (AFH)

- Initial submission due **February 18, 2019** (270 days prior to submission deadline for the next Consolidated Plan)
- Requires extensive analysis of federally funded housing, including NYCHA public housing, Housing Choice Vouchers, LIHTC, Project-based Section 8, Other HUD multifamily housing
- Significant community outreach and participation requirements
- Coordination with NYCHA and other City agencies

STRATEGY, RESEARCH, AND COMMUNICATIONS Fair housing efforts TO DATE and related projects

- **AFH PRELIMINARY preparation**
 - Identify major data issues
 - Highlight potential political / legal concerns
- **Enterprise fair housing working group**
 - Two meetings so far with Enterprise and advocates
 - Third meeting will address QAPs and prioritization “concerted community revitalization” factors
- **Community District preference**
 - Ongoing background research and preparation
- **HPD Regulatory Compliance**
 - Use of fair housing funds for future trainings or educational materials
- **SAFMR comments**
 - Lack of policy alignment with AFFH

What is REQUIRED TO SUBMIT?

1. Fair Housing Analysis

- A. Demographic Summary
- B. General Issues
 - i. Segregation/Integration
 - ii. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)
 - iii. Disparities in Access to Opportunity
 - iv. Disproportionate Housing Needs
- C. Publicly Supported Housing Analysis
- D. Disability and Access Analysis
- E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

2. Community Participation Process

- A. Public hearing + comment period
- B. More extensive public outreach than previously required for the Consolidated Plan submission
- C. Must encourage participation of traditionally underrepresented communities

3. Fair Housing Goals and Priorities

- A. Establish metrics, milestones, and timeframe for achievement
- B. Identify responsible program participants (e.g. specific City agencies)

Issues with HUD metrics

Problems with RECAPs as one of main units of analysis:

- 40% threshold and non-RECAP areas, including spillover effects.
- Public housing in RECAPs
- Propose our own definition of opportunity?

Development-level demographics:

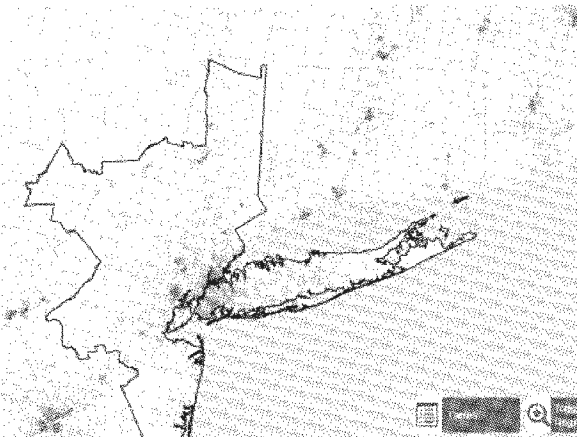
- Given the scale of NYC's housing programs, analyzing each project individually is not realistic
- LIHTC demographic data not collected
- HPD will need to propose a methodology to answer these questions that does not involve a building-level analysis of each property and its census tract. ~~This could involve a comparison of the average development demographic breakdown to that of the average census tract.~~
- Also questions of whether we're examining expected/actual tenants.

Issues with HUD metrics

Determining the appropriate region:

- HUD suggests “Core Based Statistical Area” that excludes Connecticut entirely but includes most of NJ. Combined Statistical Area would include parts of Connecticut.

CBSA



CSA



Other issues:

- Census undercounting
- Implications of Community District preference

The “balanced” approach

HUD’s definition of the “balanced approach:”

“HUD supports a balanced approach to affirmatively furthering fair housing...which encourages a variety of activities that connect housing and community development policy and investment planning with meaningful actions that affirmatively further fair housing.”

HUD’s examples of the balanced approach include:

- **Reducing disparities in access to community assets**, such as quality schools, employment, and transportation by enhancing opportunity in underserved areas where recent investments have not been made or by providing greater housing choice in areas with existing access to opportunity.
- **Using place-based strategies** in an area lacking access to opportunity to improve opportunity in that area by investing in community revitalization and preservation of existing affordable housing.
- **Providing significant affordable housing in areas with existing opportunity** that lack affordable housing in order to address segregation.
- **A mixed place-based and mobility approach:** address a racially or ethnically concentrated area of poverty through both place-based solutions to revitalize the area, as well as solutions that increase mobility for the area’s residents.

HPD's work in the context of the "balanced approach"

	Housing located in <i>high-opportunity neighborhoods</i>	Housing located primarily in <i>low-income neighborhoods</i>	Housing located in <i>both types of neighborhoods</i>
Demand strategies	-Potentially small-area FMR (SAFMR) Section-8 vouchers.	-Section-8 vouchers (non-SAFMR) -City-funded vouchers, i.e. LINC	
Supply strategies	- Voluntary inclusionary zoning -421a (if it is renewed) -80/20 projects a. Tax exempt bonds	- LIHTC 9 percent tax credit projects -Project Based Section-8 -NYCHA housing generally (though no new units)	- LIHTC 4 percent tax credit projects (tax- exempt bond financing) - Mandatory inclusionary HOUSING -Preservation efforts -Rent stabilized units -Non-421a tax-exemptions - NYCHA infill projects -Supportive housing -Other HPD programs (Hunters Point South, Seward Park, etc.) -Moderate income: M^2 Mix and Match

Supply strategies in low-income neighborhoods: Different terms for community development

1. LIHTC statute requires states to include a preference for projects in QCTs and contribute to a “concerted community revitalization” (CCR) plan.

- *But statute provides no definition of this term*, and states have interpreted it in disparate ways.
- New York has no definition.

2. In the AFFH, HUD uses the term “comprehensive community revitalization”, defined as:

“Realistic planned activities to improve the quality of life in areas that lack public and private investment, services and amenities, have significant deteriorated and abandoned properties, or other indicators of community distress.”
Such as:

- Rehabilitating housing.
- Offering economic incentives for the revitalization effort.
- Securing financial resources to fund housing improvements, community facilities and services, and business opportunities in neighborhoods in need of revitalization.
- When a community is being revitalized, the preservation of affordable housing units can be a strategy to promote integration.

Comprehensive Community Revitalization

HPD draft definition

What does HPD housing contribute to a broader CCR strategy?

Project Type	Immediate benefit	Direct benefit	Indirect benefit
New Construction	<ul style="list-style-type: none"> -High quality housing -New community space or facilities 	<ul style="list-style-type: none"> -Develops vacant lots -Provides housing stability 	<ul style="list-style-type: none"> -Displacement prevention (MIH) -Promote economic diversity (depending on context) -Promote private investment and increased property values
Preservation	<ul style="list-style-type: none"> -Improved housing quality through rehabilitation 	<ul style="list-style-type: none"> -Provides housing stability 	<ul style="list-style-type: none"> -Displacement prevention -Promote economic diversity (gentrifying or high opportunity neighborhoods) -Promote private investment and increased property values

Comprehensive Community Revitalization

HPD draft definition

HPD should identify neighborhoods with these attributes and consider financing affordable housing in them:

- *Education*: Quality of existing schools, investment in new schools, after-school opportunities.
- *Transportation*: existing and planned transit access
- *Public safety*: trends in crime, street lighting, public space/park improvements
- *Health*: access to and quality of medical facilities/parks/rec facilities/FRESH zones
- *Employment*: investment in local econ development, job training, local hiring, access to jobs
- *Market Context*: neighborhood gentrifying, with loss of affordable housing? Existing affordable?
- *Other neighborhood amenities*: cultural institutions retail, non-profits, existing plans/activism

Such a plan would not only invest in neighborhoods with these attributes but consider them as part of the decision to site affordable housing.

Questions for further discussion on Comprehensive Community Revitalization strategy

- *At what scale* should we consider a CCR strategy? (e.g. community district or smaller?)
- *How to weigh or prioritize certain CCR components* over others? (e.g. transit access vs. school quality)
- *How does a CCR strategy interact with Qualified Census Tract (QCT) / Designated Development Area (DDA) designation* and the basis boost?
- Although CCR is specific to LIHTC and the QAP, *how can we integrate the concept into other types of housing investments*, and documents such as the AFH?

Segregation/Integration trends

Table 3 - Racial/Ethnic Dissimilarity Trends

	(New York, NY CDBG, HOME, ESG) Jurisdiction			(New York-Newark-Jersey City, NY- NJ-PA CBSA) Region		
Racial/Ethnic Dissimilarity Index	1990	2000	2010	1990	2000	2010
Non-White/White	67.72	66.11	65.66	65.97	63.53	61.73
Black/White	83.45	83.12	83.36	80.30	78.88	78.80
Hispanic/White	65.51	67.08	67.39	66.07	65.23	63.11
Asian or Pacific Islander/White	47.65	49.02	54.20	47.63	50.39	54.21

Note 1: Data Sources: Decennial Census

Note 2: Refer to the Data Documentation for details (www.hudexchange.info).

Findings:

- NYC scores in the “high segregation” category for all ethnicities, at all time periods, with the exception of Asian or Pacific Islander/White
- Within NYC, the levels of segregation have remained mostly constant over the last 20 years, with the exception of Asian or Pacific Islander/White which has become more segregated.
- Within the region, levels of segregation have decreased slightly, again with the exception of Asian or Pacific Islander/White which has become more segregated

The dissimilarity index measures the degree to which two groups are evenly distributed across a geographic area.

Generally, dissimilarity index values between

0 - 39: low segregation

40 - 54: moderate segregation

55 - 100: high level of segregation

Contributing factors of segregation, RECAPs, and patterns of public housing

Definition of “contributing factors of segregation, RECAPs, and patterns of public housing: “Why members of particular protected classes may experience restricted housing choice due to segregation, R/ECAPs, disparities in access to opportunity, disproportionate housing needs, or other fair housing issues.”

Under the AFFH rule, program participants must:

- *Identify fair housing issues and significant contributing factors;*
- *Prioritize contributing factors, giving highest priority to those factors that limit or deny fair housing choice or access to opportunity or negatively impact fair housing or civil rights compliance;*
- *Set priorities and goals to address the identified contributing factors and related fair housing issues.*

List of contributing factors of segregation (see appendix)

- **Community opposition**
- **Displacement of residents due to economic pressures**
- **Lack of community revitalization strategies**
- Lack of private investments in specific neighborhoods
- **Lack of public investments in specific neighborhoods, including services or amenities**
- **Lack of regional cooperation**
- **Land use and zoning laws**
- Lending Discrimination
- **Location and type of affordable housing**
- Occupancy codes and restrictions
- **History of segregation in NYC**
- Cost to build and cost of available land
- Admissions and occupancy policies and procedures
- Impediments to mobility
- Quality of affordable housing information programs
- Siting selection policies, practices and decisions for publicly supported housing
- Policies that segregate the disabled.

Disparities in access to opportunities

The AFH requires an analysis of “disparities in access to opportunity”

Defined as: “how a person’s place of residence, locations of different opportunities, and related policies contribute to fair housing issues on the basis of protected class.” HUD’s five main factors:

- 1) Access to education
- 2) Employment
- 3) Transportation
- 4) Low poverty exposure
- 5) Environmentally healthy neighborhoods

Our AFH will focus on access to education, employment, and low poverty exposure, because measures of transportation access and environmentally healthy neighborhoods ARE VIRTUALLY A NON-ISSUE, AT LEAST IN THE DATA provided by HUD.

School Proficiency Index

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Demographics 2010

1 Dot = 75 People

- Black, Non-Hispanic
- Hispanic

School Proficiency Index

- 0 - 10
- 10.1 - 20
- 20.1 - 30
- 30.1 - 40
- 40.1 - 50
- 50.1 - 60
- 60.1 - 70
- 70.1 - 80
- 80.1 - 90
- 90.1 - 100

School Proficiency Index is determined based on the performance of 4th grade elementary students on state exams.

Name: Map 9 - Demographics and School Proficiency

Description: School Proficiency Index for Jurisdiction and Region with race/ethnicity, national origin, family status, and R/ECAPs

Jurisdiction: New York (CDBG, HOME, ESG)

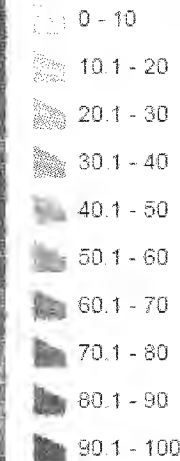
Region: New York-Newark-Jersey City, NY-NJ-PA

Labor market index

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Labor Market Index



The Labor Market Index measures unemployment rate, labor-force participation rate, and percent of the population age 25 and above with at least a bachelor's degree, by census tract. Darker indicates a higher labor market index.

Name: Map 11 - Demographics and Labor Market

Description: Labor Engagement Index with race/ethnicity, national origin, family status and R/ECAPS

Jurisdiction: New York (CDBG, HOME, ESG)

Region: New York-Newark-Jersey City, NY-NJ-PA

Trends in disparities in access to opportunities

Table 12 - Opportunity Indicators, by Race/Ethnicity

(New York, NY CDBG, HOME, ESG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index
Total Population			
White, Non-Hispanic	56.00	63.47	67.03
Black, Non-Hispanic	32.33	28.62	35.25
Hispanic	26.86	36.06	36.13
Asian or Pacific Islander, Non-Hispanic	43.45	61.51	54.01
Native American, Non-Hispanic	34.73	39.40	39.28
Population below federal poverty line			
White, Non-Hispanic	37.71	54.92	54.43
Black, Non-Hispanic	20.07	25.59	26.96
Hispanic	17.90	29.53	28.26
Asian or Pacific Islander, Non-Hispanic	32.57	56.16	46.67
Native American, Non-Hispanic	21.35	35.52	33.98

Definition of opportunity indicators:

Higher values for a particular race/ethnicity indicate a greater likelihood that they reside in Census tracts with greater access to that opportunity indicator. The indices values range from 0 to 100. **The higher the value, the greater the access to opportunity.**

Findings:

- Blacks and Hispanics have the lowest likelihood of living in census tracts with low poverty, good schools, and a high labor-market index.
- Blacks have less access to good schools than Hispanics, despite having a greater chance of living in a low poverty neighborhood.
- Regional analysis (not pictured) shows all groups performing better on these indexes, with Hispanics also disproportionately likely to live in tracts with good-schools than African Americans (compared to their exposure to low-poverty neighborhoods, which are equal)

Publicly supported housing analysis: Racial / ethnic breakdown by housing type

Table 6 - Publicly Supported Housing Residents by Race/Ethnicity

(New York, NY CDBG, HOME, ESG) Jurisdiction	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Housing Type								
Public Housing	8,245	4.94	75,552	45.28	75,576	45.29	7,457	4.47
Project-Based Section 8	6,111	13.18	14,307	30.86	23,050	49.71	2,725	5.88
Other Multifamily	1,735	17.12	3,349	33.04	3,539	34.92	1,488	14.68
HCV Program	51,548	42.96	50,736	42.28	14,897	12.41	2,165	1.80
0-30% of AMI	182,985	26.15	181,195	25.89	249,070	35.59	73,500	10.50
0-50% of AMI	274,935	24.54	285,300	25.46	381,530	34.05	122,580	10.94
0-80% of AMI	437,590	26.96	419,905	25.87	521,530	32.13	177,300	10.92
(New York, NY CDBG, HOME, ESG)	2,722,904	33.31	1,861,295	22.77	2,336,076	28.58	1,030,914	12.61
Note 1: Data Sources: Decennial Census; APSH; CHAS								
Note 2: #s presented are numbers of households not individuals.								
Note 3: Refer to the Data Documentation for details (www.hudexchange.info).								

Percentage values indicate share of households of each race/ethnicity in each housing type.

Findings:

- White households make up a larger share of HCV holders than any other demographic group (43% of all households).
- Hispanics make up only 12% of HCV households. They are underrepresented compared to their share of the city's low-income and overall population.

Publicly supported housing analysis: Demographic breakdown by RECAP / non-RECAP

Table 7 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category

(New York, NY CDBG, HOME, ESG) Jurisdiction	Total # units (occupied)	% Elderly	% with a disability*	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children
Public Housing								
R/ECAP tracts	81,156	35.27	21.07	4.59	48.85	42.58	3.95	37.20
Non R/ECAP tracts	89,301	39.46	22.73	5.26	42.03	47.75	4.93	33.25
Project-based Section 8								
R/ECAP tracts	13,185	38.18	15.03	2.54	28.66	68.34		34.40
Non R/ECAP tracts	37,896	51.49	15.07	17.33	31.71	42.44	8.00	23.95
Other HUD Multifamily								
R/ECAP tracts	4,544							
Non R/ECAP tracts	11,072	83.37	8.67	17.30	29.23	36.03	17.17	
HCV Program								
R/ECAP tracts	28,122	22.55	24.85	33.92	48.03	16.59	1.02	45.44
Non R/ECAP tracts	106,261	32.80	30.88	45.50	40.77	11.15	2.01	37.60

Note 1: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household.

Note 2: Data Sources: APSH

Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

Percentage values indicate share of households of each demographic group in RECAP/non-RECAP, in each housing type.

Findings:

- Hispanic households have a high concentration in Project-based Section 8 housing overall, but are much more concentrated in RECAPs than other groups.
- White households make up a larger share of all HCV households in RECAPs (compared to Hispanic households). But this may simply reflect the much higher share of white households in the HCV program overall.

Publicly supported housing analysis:

Issues with RECAP vs. non-RECAP distinction

The AFH asks us to compare RECAP vs. non-RECAP demographics, this type of analysis may have limited value in assessing fair housing outcomes of publicly supported housing programs in NYC:

- **All programs have a higher number of units in non-RECAPs than in RECAPs.**
 - Cumulatively, only 33% of all households in publicly supported housing included in this data are in RECAPs (67% in non-RECAPs).
- **HCV has the highest share of units in non-RECAPs.**
 - All demographic groups in HCV have a greater proportion of residents in non-RECAPs.
- **Public housing has the highest % of units in RECAPs.**
 - This could stem from the fact that the very presence of public housing can define a RECAP tract.
- **RECAP status for white households is not a meaningful measure.** RECAPs by definition cannot have a majority of white households.
- **Non-RECAP status is not a meaningful measure of opportunity.**

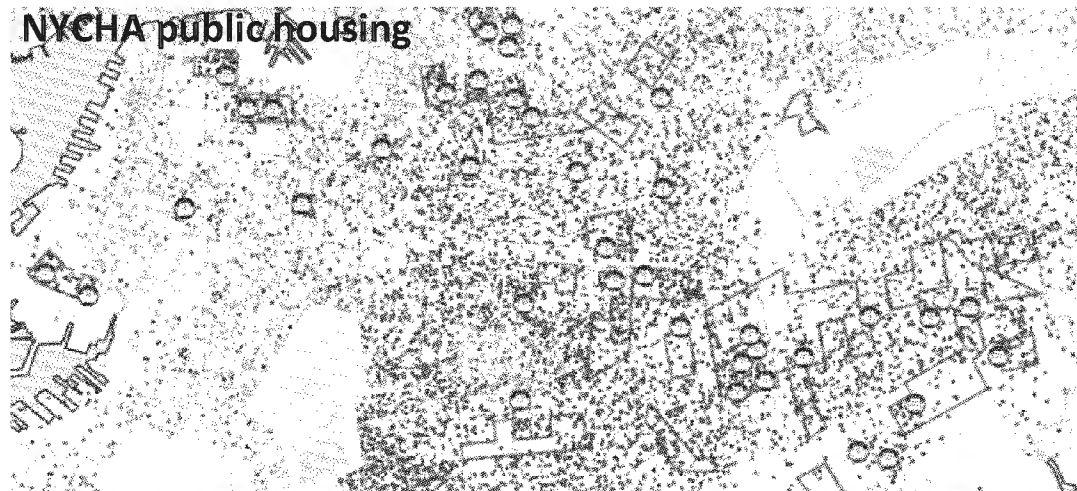
Publicly supported housing analysis: Map-based questions

Central Brooklyn

Project-based Section 8



NYCHA public housing



- Maps show siting of housing in segregated areas, in or adjacent to RECAPs, although not exclusively.
- Maps do not reflect volume of units

Demographics 2010

1 Dot = 75

- White, Non-Hispanic
- Black, Non-Hispanic
- Native American, Non-Hispanic
- Asian/Pacific Islander, Non-Hispanic
- Hispanic
- Other, Non-Hispanic

TRACT

RECAP



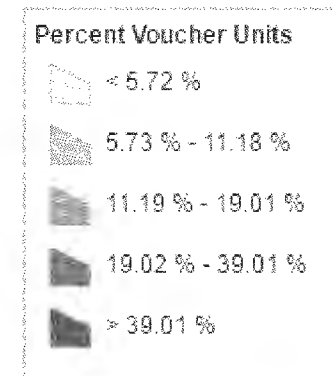
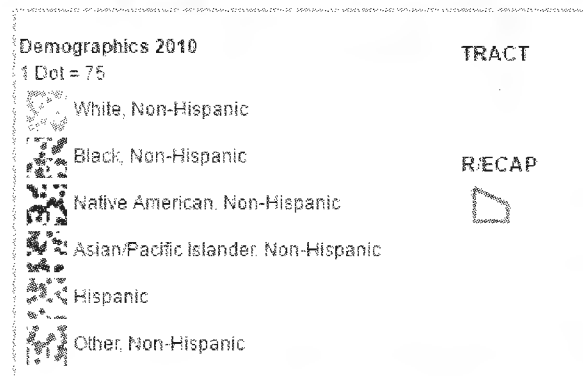
Publicly supported housing analysis: Map-based questions

Central Brooklyn



- High HCV concentration does not always occur inside RECAPs, but often in close proximity.
- To the extent that RECAPs are dominated by NYCHA public housing, voucher holders may not be able to live in them anyway.
- High voucher (but not RECAP) concentration in predominantly white areas.

Housing Choice Voucher use rate by census tract



Disparities in access for people with disabilities

Why disability analysis in the AFFH?

- *Historical discrimination against people with disabilities* that has limited their opportunity to live independently in the community with appropriate supports and required them to live in institutions or other segregated settings.

What is NYC supposed to present?

- *Assess to what extent persons with disabilities reside in segregated or integrated settings*, as well as the range of options for persons with disabilities to access affordable housing and supportive services in community-based settings within the jurisdiction and region.

Local data on people with disabilities

This section must rely on local data, perhaps handled by Mayor's Office for Disabilities.

Data we will need:

- » length of wait lists for accessible units in publicly supported housing,
 - » availability of accessible units in non-publicly supported housing available to HCV participants, whether public funding (e.g. CDBG funds) or tax credits are available for reasonable modifications in rental units and/or for homeowners,
 - » whether accessible units are occupied by households requiring accessibility features,
 - » whether publicly supported housing is in compliance with accessibility requirements.
-
- Data Source for HUD provided data: American Community Survey (ACS), 2009-2013; Inventory Management System (IMS)/ PIH Information Center (PIC), 2013; Tenant Rental Assistance Certification System (TRACS), 2013

Next steps

1. Next steps in process

- a. NYCHA/regional decision
- b. Other inter-agency coordination
- c. Community engagement

2. Policy recommendations that could come out of AFH

- a. How to use the AFH
 - Set program-specific fair housing goals
 - Compile demographic data on publicly supported housing
- b. Better or more meaningful measures of low and high opportunity areas

Appendix: High priority contributing factors

Community opposition

- *Difficulty*: High
- *Issues*: Securing community buy-in for fair housing is very difficult.
 - Groups on *both* sides don't necessarily support integration (anti-displacement, ethnic solidarity).
 - For Public housing: Opposition can be high in higher opportunity areas (e.g. Queens, Staten Island) except for senior housing
 - However, many communities also advocate for low income housing siting

Displacement of residents due to economic pressures

- *Difficulty*: High
- *Issues*: Implications for preservation strategy: justify anti-displacement because gentrification creates neighborhoods of opportunity? Or justify through balanced approach.
 - Gentrifying neighborhoods = neighborhoods of opportunity? Need a finer measure of opportunity/what neighborhoods would qualify for fair housing.
 - Where are residents being displaced to?
 - Debate about the extent of gentrification and whether it's always bad for existing residents.

High priority contributing factors

Lack of community revitalization strategies

- *Difficulty*: Moderate
- *Issues*: Revitalization as gentrification
 - Over-investment in building housing in low-income neighborhoods: New York City could be accused by some fair housing advocates as being overly focused on low-income communities instead of providing access to opportunity.
 - “Siloed” LIHTC developments – not necessarily situated in places as part of broader revitalization strategy.

Lack of public investments in specific neighborhoods, including services or amenities

- *Difficulty*: high (for schools). *Also not HPD’s role – coordinate with DOE*
 - Huge disparities in schools, esp pronounced for LIHTC developments
 - Huge disparities in public safety across neighborhoods, with LIHTC projects, and subsidized housing generally, built in less safe neighborhoods, and with access to worse schools than other subsidized housing.
 - “CCR” strategy would ensure that new housing is accompanied by other neighborhood investments

High priority contributing factors

Lack of regional cooperation

- *Difficulty:* Very high
- *Issues:* New York City's focus on keeping residents in the city, while justified from a city perspective, may not be justified from a fair housing perspective.
 - Should the city be using mobility counseling and encouraging residents living in low-income neighborhoods to move to suburbs outside NYC w/better schools? What types of resources are lost when families leave the city (social, institutional etc.)
 - Regional collaboration could provide more opportunities to build affordable housing in high opportunity areas outside of NYC
 - NY State does not have requirements for jurisdictions to build affordable housing (as in NJ), but this is out of our control

Land use and zoning laws

- *Difficulty:* High
- *Issues:* MIH targeting low-income neighborhoods
 - Exclusionary Zoning in NYC
 - Exclusionary zoning outside NYC

High priority contributing factors

Location and type of affordable housing

- *Difficulty* : Very high
- *Issues*: Disproportionate LIHTC developments in R/ECAPS. Where are we building it? Who tends to apply to LIHTC?
 - Where can voucher holders afford to live?
 - Public housing in disproportionately low-income neighborhoods.
 - MIH in low-income neighborhoods.
 - History of New York City building affordable housing in low-income neighborhoods (i.e. South Bronx).
 - Definition above seems to incorporate both naturally occurring affordable housing and subsidized affordable housing.

History of segregation in NYC

- *Difficulty*: High
- *Issues*:
 - Justifying past and present creation of affordable housing in minority neighborhoods (i.e. the Bronx) which may perpetuate segregation.
 - Acknowledging that much of segregation in NYC was created through federal policies (redlining, urban renewal).